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November 16, 2021

VIA ECF & U.S.P.S. PRIORITY MAIL

Hon. Renée Marie Bumb, U.S.D.J.
United States District Court
District of New Jersey Camden
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, New Jersey 08101

RE: Affinity Healthcare Group Voorhees, LLC, et al. v. Voorhees Twp., et al.
Civil Action No.: 1:21-cv-00800-RMB-AMB
Our File No. 16805

Dear Judge Bumb:

Please be advised that I represent Plaintiffs Affinity Healthcare Group Voorhees, LLC and Dr. Kenneth Brown in the matter referenced above. Pending before Your Honor are Defendants Voorhees Township Planning Board and Voorhees Township Zoning Board's Motions for Summary Judgment, currently returnable on December 6, 2021.

Defendants' motions are extensive and reference exhibits, which total 450 pages. I am therefore requesting a one-cycle adjournment to December 20, 2021, which will allow me sufficient time to review the motions, discuss them with my clients, and file an opposition on or before December 6, 2021. I have obtained the consent of J. Brooks DiDonato, Esq., who has entered an appearance on behalf of all Defendants in this matter, to adjourn the motions. I have requested but have not received a reply from Christopher J. Norman, Esq., who filed the aforementioned motions on behalf of the Defendant Boards.

Thank you for your consideration of this request.

Respectfully yours,

HELMER, CONLEY & KASSELMAN, P.A.

Samuel Reale, Jr., Esquire

SRjr/lnn

cc: J. Brooks DiDonato, Esq. (*via ECF & E-Mail*)
John C. Gillespie, Esq. (*via ECF & E-Mail*)
Stuart Platt, Esq. (*via ECF & E-Mail*)
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Plaintiffs (*via E-Mail only*)